

EXHIBIT B

From: [Odom, Linda C.](#)
To: [Longstreth, John](#); [Cohen, Dan S.](#); [Eldridge, Amy J.](#)
Subject: Fwd: Kessler v. City of Charlottesville - City's First Set of Discovery
Date: Wednesday, June 20, 2018 6:58:32 PM
Attachments: [image001.jpg](#)
[ATT00001.htm](#)
[JasonKesslerdiscoveryresponses.pdf](#)
[ATT00002.htm](#)

FYI

Sent from my iPhone

Begin forwarded message:

From: James Kolenich <jek318@gmail.com>
Date: June 20, 2018 at 6:32:33 PM EDT
To: "Odom, Linda C." <Linda.Odom@klgates.com>
Subject: Re: Kessler v. City of Charlottesville - City's First Set of Discovery

Please find attached Jason Kessler's discovery responses. Let me know how to provide you with dropbox access as to our responsive docs. Prior to that we would like your agreement that the responsive docs will be kept confidential, that is not publicized though it can be used in the ordinary course of litigation. The dropbox contents has been vetted and there is no privileged material contained therein.

I will be forwarding 6 emails that are responsive. Please consider these emails confidential as well.

Jim

On Wed, Jun 20, 2018 at 3:45 PM, Odom, Linda C. <Linda.Odom@klgates.com> wrote:

Thanks for the update.

Linda

From: James Kolenich [<mailto:jek318@gmail.com>]
Sent: Wednesday, June 20, 2018 3:11 PM
To: Odom, Linda C.
Subject: Re: Kessler v. City of Charlottesville - City's First Set of Discovery

Hi Linda: Working on it now, Definitely will get it to you today.

Jim

On Wed, Jun 20, 2018 at 3:00 PM, Odom, Linda C.
<Linda.Odom@klgates.com> wrote:

Elmer and Jim,

I am writing to follow-up on my call with Elmer this morning. Mr. Kessler's discovery responses were due yesterday and, given the approaching depositions, we will have to file a motion to compel production tomorrow if we do not receive your written responses and the documents by the end of today. We are particularly interested in all of Mr. Kessler's social media postings (videos and texts), mobile phone texts, chat room discussions, Discord, 4Chan, 8 Chan and other posts (text or video), and any encrypted messages such as he might have sent using WhatsApp or other encrypted messaging apps or programs, whether on a mobile device or computer, as well as any hard copy documents relating to his planning for the Unite the Right 2 rally and his permitted rally in Washington, DC. Please let us know as soon as you can whether you can provide these and the other requested materials and responses by 5:30 today.

Regards,

Linda